



27 May 2003

Bill Pennington
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sent via email: bpenning@energy.state.ca.us

re: Minor comments on February draft, Title 24

Dear Mr. Pennington:

The following comments are of a less urgent nature, primarily typos and minor points of uncertainty. I do not expect a response to these comments.

Section 101

“Atrium” is defined as a non-mall; “Malls, arcades, and atria” have a common definition (under “occupancy type”), and “arcades” are undefined.

Section 117

Is the CEC aware that, by requiring building air tightness without also requiring adequate minimum air exchanges, it is mandating a continuation of the mold/mildew hysteria by promoting the environments in which these organisms will flourish?

Section 141 (a) 1.D

It looks like the old text which is being replaced by the new text here was not struck out.

Section 143 (a) 1.A

I suggest deleting the first “minimum” or replacing it with “measured.” Anything can have a “minimum” emittance below 0.75 regardless of its “actual.” Note also that this parameter can

vary somewhat, both because of measurability problems (particularly for thick materials), and because of innate repeatability and variations with age. Thus the CRRC permits Licensed Manufacturers to understate their measurements to avoid unnecessary disputes.

Section 149 (b)

Since subsection (“item”?) 3 is proposed to be deleted, the reference in the lead paragraph to this section should also be deleted.

If you have any questions, please call me at (323) 908-5279.

Paul A. Beemer
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